

Angelo A. Stio III  
Melissa A. Chuderewicz  
**TROUTMAN PEPPER**  
**HAMILTON SANDERS LLP**  
Suite 400  
301 Carnegie Center  
Princeton, NJ 08543-5276  
(609) 951-4125  
Angelo.Stio@troutman.com  
Melissa.Chuderewicz@troutman.com

*Attorneys for Defendant Deluxe Corporation*

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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ATLAS DATA PRIVACY  
CORPORATION, et al.,

Plaintiffs,

v.

DELUXE CORPORATION, et al.,

Defendants.

Civil Action No. 2:24-cv-04080-CCC-AME

**APPLICATION FOR EXTENSION OF  
TIME PURSUANT TO  
LOCAL FEDERAL RULE 6.1**

Application is hereby made pursuant to Local Federal Rule 6.1 for a Clerk's Order extending the time within which Defendant Deluxe Corporation ("Deluxe") may answer, move or otherwise respond to the Complaint filed by Plaintiffs Atlas Data Privacy Corporation, Jane Doe-1, Jane Doe-2, Edwin Maldonado, Scott Maloney, Justyna Maloney, Patrick Colligan, Peter Andreyev, and William Sullivan ("Plaintiffs"), and it is represented that:

1. Plaintiffs filed their Complaint on February 7, 2024.
2. Deluxe was served with the Complaint on February 22, 2024.
3. Deluxe filed a Petition for Removal with this Court pursuant to 28 U.S.C. § 1446

on March 21, 2024 (ECF Doc. No 1). The Petition was filed within thirty (30) days of Deluxe's

receipt “through service or otherwise, of a copy of the initial pleading setting forth the claim for relief upon which such action or proceeding is based.” 28 U.S.C. § 1446(b).

4. Deluxe did not answer, move or otherwise reply to the Complaint in state court.

Pursuant to Fed. R. Civ. P. 81(c)(2), Deluxe’s response to the Complaint is due within the longest of these periods: “(A) 21 days after receiving—through service or otherwise—a copy of the initial pleading stating the claim for relief; (B) 21 days after being served with the summons for an initial pleading on file at the time of service; or (C) 7 days after the notice of removal is filed.”

5. Accordingly, Deluxe’s response to the Complaint is due 7 days after March 21, 2024 – the longest period provided under Rule 81(c) – or March 28, 2024, which date is determined under Fed. R. Civ. P. 6(a). Thus, Deluxe’s time to answer or otherwise respond has not yet expired.

6. No similar extensions of time to respond to this pleading has been obtained by Deluxe.

7. Deluxe requests, pursuant to L.Civ.R. 6.1(b), that the Clerk enter an Order extending the time in which Deluxe may answer, move or otherwise respond to the Complaint by 14 days or until April 11, 2024.

By: /s/ Angelo A. Stio III  
Angelo A. Stio III  
Melissa A. Chuderewicz  
**TROUTMAN PEPPER HAMILTON  
SANDERS LLP**  
Suite 400  
301 Carnegie Center  
Princeton, NJ 08540-6227  
(609) 951-4125  
angelo.stio@troutman.com  
melissa.chuderewicz@troutman.com  
*Attorneys for Defendant Deluxe Corporation*

Dated: March 27, 2024

Angelo A. Stio III  
Melissa A. Chuderewicz  
**TROUTMAN PEPPER HAMILTON SANDERS LLP**  
Suite 400  
301 Carnegie Center  
Princeton, NJ 08540-6227  
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Civil Action No. 2:24-cv-04080-CCC-AME

**ORDER GRANTING APPLICATION FOR  
AN EXTENSION OF TIME PURSUANT TO  
L.CIV.R. 6.1**

The Application of Defendant Deluxe Corporation (“Deluxe”) for an Extension of Time to Answer, Move or Otherwise Respond to Plaintiffs’ Complaint is **GRANTED**. Deluxe’s time to answer, move or otherwise respond to the Complaint is extended by fourteen (14) days up to and including April 11, 2024.

ORDER DATED \_\_\_\_\_

WILLIAM T. WALSH, Clerk

By: \_\_\_\_\_  
Deputy Clerk